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12 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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14 ALICIA INES MOYA GARAY, JUAN
JAIME LOPEZ-JIMENEZ, and ARRIBA
15 LAS VEGAS WORKER CENTER,

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Plaintiffs,

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vs.

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CITY OF LAS VEGAS, et al.,

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Defendants.

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Case No.: 2:20-cv-00119-GMN-EJY

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND FEDERAL
DEFENDANTS' DEADLINE TO
ANSWER THE FOURTH AMENDED
COMPLAINT**

(FIRST REQUEST)

Current Deadline: June 27, 2025

New Deadline: July 25, 2025

1 **STIPULATION AND [PROPOSED] ORDER TO EXTEND ANSWER DEADLINE**

2 Pursuant to LR IA 6-1, Federal Defendants United States Immigration and Customs
3 Enforcement (“ICE”), Tae D. Johnson, and Michael Bernacke (“Federal Defendants”) and
4 Plaintiffs Alicia Ines Moya Garay, Juan Jaime Lopez-Jimenez, and Arriba Las Vegas Worker
5 Center (“Plaintiffs”), hereby stipulate as follows:

- 6 1. On November 5, 2024, Plaintiffs filed a Fourth Amended Complaint (ECF No. 144).
- 7 2. On December 17, 2024, Federal Defendants filed a Motion to Dismiss Plaintiffs’ Fourth
8 Amended Complaint (ECF No. 147).
- 9 3. On June 14, 2025, the Court denied Federal Defendants’ Motion to Dismiss (ECF No. 158).
- 10 4. Pursuant to FRCP 12(a)(4)(A), Federal Defendants’ default deadline to file a responsive
11 pleading is June 27, 2025.
- 12 5. The Parties have conferred and agreed to extend Federal Defendants’ deadline to answer
13 the Fourth Amended Complaint by twenty-eight (28) days through July 25, 2025.
- 14 6. Undersigned counsel for Federal Defendants has previously-scheduled leave and will be
15 traveling internationally from June 23, 2025 to July 2, 2025. Accordingly, undersigned
16 counsel requires additional time to confer with his clients regarding the allegations in the
17 Amended Complaint.
- 18 7. No trial date has been set for this action, the extension requested is not intended for
19 purposes of delay, and no party will be prejudiced by the extension requested.
- 20 8. This is the first request for an extension of this deadline.
- 21 9. For these reasons, and for good cause shown, the Parties respectfully request that the Court
22 enter an order extending Federal Defendants’ deadline to answer the Fourth Amended
23 Complaint by twenty-eight (28) days through July 25, 2025.

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1 Dated: June 20, 2025
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3 */s/ Luis L. Lozada*
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12 *Attorneys for Plaintiffs*

13 *Attorneys for Federal Defendants*

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18 IT IS SO ORDERED.
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21 UNITED STATES MAGISTRATE JUDGE
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23 DATED: June 23, 2025
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